

**BECKER & POLIAKOFF LLP**

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*Attorneys for Defendants Janet Jaffe Trust UA dtd  
4/20/90 and the Alvin Jaffe Trust dtd 4/20/90; and Janet  
Jaffe, individually and in her capacity as Trustee for the  
Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe  
Trust dtd 4/20/90*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JANET JAFFE TRUST UA DTD 4/20/90; ALVIN  
JAFFE TRUST DTD 4/20/90; and JANET JAFFE,  
individually and in her capacity as Trustee for the Janet  
Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust  
dtd 4/20/90,

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04798 (SMB)

Defendants.

**NOTICE OF SUBSTITUTION OF COUNSEL AND PROPOSED ORDER**

PLEASE TAKE NOTICE that the undersigned hereby consent to the substitution of Becker & Poliakoff, LLP for Lax & Neville LLP as counsel for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90; and Janet Jaffe, individually and in her capacity as Trustee for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90 (the "Defendants"). All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

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[jgorchkova@bplegal.com](mailto:jgorchkova@bplegal.com)

PLEASE TAKE FURTHER NOTICE that the Defendants have knowledge of and consent to this substitution of counsel.

September 10, 2015

**LAX & NEVILLE LLP**

*Withdrawing Attorneys for Defendants*

By: /s/ Brian Neville

Brian Neville  
1450 Broadway, 35<sup>th</sup> Floor  
New York, New York 10018  
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[bnevilles@laxneville.com](mailto:bnevilles@laxneville.com)

September 10, 2015

**BECKER & POLIAKOFF LLP**

*Superseding Attorneys for Defendants*

By: /s/ Helen Davis Chaitman

Helen Davis Chaitman  
45 Broadway  
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(212) 599-3322  
[hchaitman@bplegal.com](mailto:hchaitman@bplegal.com)

**SO ORDERED:**

/s/

**HON. STUART M. BERNSTEIN**  
**UNITED STATES BANKRUPTCY JUDGE**

**Dated: September \_\_\_, 2015**  
**New York, New York**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-1789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

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BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

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IRVING H. PICARD, Trustee for the Liquidation of  
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Adv. Pro. No. 10-04798 (SMB)

Plaintiff,

v.

JANET JAFFE TRUST UA DTD 4/20/90; ALVIN  
JAFFE TRUST DTD 4/20/90; and JANET JAFFE,  
individually and in her capacity as Trustee for the Janet  
Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust  
dt 4/20/90,

Defendants.

I, HELEN DAVIS CHAITMAN, declare as follows:

1. I am a member of the firm Becker & Poliakoff, LLP and a member of the Bar of  
this Court Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District  
Courts for the Southern and Eastern Districts of New York. I submit this declaration in support  
of the accompanying notice and proposed order substituting Becker & Poliakoff, LLP for Lax &

Neville LLP as counsel for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90; and Janet Jaffe, individually and in her capacity as Trustee for the Janet Jaffe Trust UA dtd 4/20/90 and the Alvin Jaffe Trust dtd 4/20/90 (the “Defendants”) in the above-captioned adversary proceeding. I also have read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendants have requested and consent to this substitution of counsel.
3. It is not expected that any delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 10, 2015  
New York, New York

By: /s/ Helen Davis Chaitman  
Helen Davis Chaitman